

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

_____	)	
United States of America	)	
	)	
v.	)	Cr. No. 23-cr-12-1-PB
	)	
Rhonda Simpson	)	
_____	)	

**MOTION TO CONTINUE TRIAL SCHEDULED FOR APRIL 1, 2025**

NOW COMES Defendant, Rhonda Simpson, by and through her attorneys Peter D. Anderson, Esquire of McLane Middleton, P.A., and hereby respectfully moves for a continuance of the Trial scheduled for April 1, 2025. In support of this Motion, undersigned counsel states as follows:

1. The Defendant is charged by Indictment with Conspiracy to Submit False Claims contrary to 18 U.S.C. § 286 and Conspiracy to Make False Statements contrary to 18 U.S.C. §§ 371 and 1001(a)(1).
2. The Final Pretrial Conference in this matter is currently scheduled for March 18, 2025.
3. A two (2) week Jury Trial in this matter is currently is scheduled for April 1, 2025.
4. Undersigned counsel has recently been retained by the Defendant in this matter. Appearances are being filed simultaneously herewith.
5. Undersigned counsel has not yet received the file maintained by Shaheen and Gordon, prior counsel in this matter. As such, additional time will be needed to review the facts of this matter in order to effectively represent Ms. Simpson.

6. Counsel will file a Waiver of Speedy Trial Rights signed by Ms. Simpson this week.

7. Undersigned counsel reached out to U.S. Attorney Charles Rombeau via email on March 10, 2025 to seek his assent to this motion.

8. On March 12, 2025, Attorney Rombeau responded to our email and assented to our Motion to Continue the Trial scheduled for April 1, 2025.

WHEREFORE, undersigned counsel respectfully requests that this Honorable Court:

- a. Grant the within Motion;
- b. Continue the Trial in this matter until late summer/early fall; and
- c. Grant such further relief as this Court deems necessary and just.

Respectfully submitted,

Dated: March 12, 2025

/s/ Peter D. Anderson

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/Peter D. Anderson

Peter D. Anderson